

COMMUNICATIONS & ELECTRONICS, INC.

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FEDERAL COMMUNICATIONS COMMISSION
128 North Main Street, Room 52641

(319) 385-7650

January 26, 1993

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FCC - MAIL ROOM

Federal Communications Commission
Washington, D.C. 20554

Dear Commission:

Enclosed please find five copies of our formal comments regarding our feelings about the FCC's proposed rule changes, explained in detail in PR Docket 92-235, the Replacement of Part 90 by Part 88.

We strongly oppose the changes that the FCC wants to make, as we state in our formal comments. We hope and trust that you will take all comments submitted to you seriously and that you will make a fair decision that will benefit the most people.

Thank you for your time.

Sincerely,

ADVANCED COMMUNICATIONS & ELECTRONICS, INC.



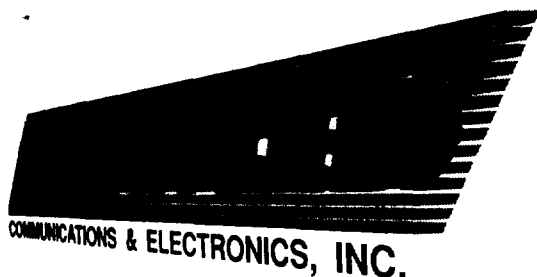
Daniel Peterson
Vice President

wm

Enclosures

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

126 North Main Street • Mt. Pleasant, SC 29521

(319) 385-7650

Before the
Federal Communication Commission
Washington, D.C. 20554

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In the Matter of)
)
Replacement of Part 90) PR Docket 92-235
by Part 88 to Revise)
the Private Land Mobile)
Radio Services and Modify)
the Policies Governing them)

To: The Commission

COMMENT OF

Advanced Communications & Electronics, Inc. submits its comments in response to the Commission's Notice of Proposed Rule Making in this proceedings.

I strongly oppose all three changes set about in the new revision to Part 88 of the FCC rules. As far as the channel splitting proposal, 1996 is far too early, as the Midwest is just starting to recover from the farm crunch. Many small and large farms and ag-related businesses have purchased radios or updated their equipment in the last few years. There is no way they can afford by 1996 to replace all that equipment once more.

Along with that, the new equipment is not even available on a proven and tested basis yet. We need more time for the equipment that has been purchased recently to be amortized, and we also need to wait until manufacturers can provide a proven, quality radio that will work in the fields.

The power reduction plan is far too severe. Most radio users are looking for more coverage and not less. And the idea of adding more base stations to supply this coverage is infeasible from a cost standpoint. The high cost of adding these base stations and controlling them would make radio system usage for the small operator unaffordable.

As far as trying to find places for these additional base stations, there are very few tower sites now, and it is getting harder and harder every year to put large towers up to provide coverage because people do not want these located in their back yards or surrounding areas.

In respect to the consolidation of the land mobile services, it is absolutely unnecessary. It will be disruptive and will deprive land mobile licensees the assurance that current services provide that frequency will be available to them when needed.

While the current FCC Rules Part 90 may not be 100% perfect, they are far better than the proposed changes you want to make. If the FCC can develop a way to enforce their current rules and regulations, a lot of the congestion and interference problems could be cleared up. We need to improve on what we have and enforce the rules that we have, but not make it so it is unaffordable and unreasonable for small businesses and large to own their own reliable communications system by changing these rules.

Respectfully submitted,

Advanced Communications &
Electronics, Inc.

By: 

Title: 